

MIED (Rev. 2/07) Prisoner Civil Rights Complaint

Official Use Only

Case Number	Judge	Magistrate Judge
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Case: 2:09-cv-14668
 Judge: Tarnow, Arthur J
 MJ: Randon, Mark A.
 Filed: 12-01-2009 At 11:34 AM
 PRIS Terrence Moore v Peter Ellenso
 n, et al (SMS)

PRISONER CIVIL RIGHTS COMPLAINT

This form is for use by state prisoners filing under 42 U.S.C. § 1983 and federal prisoners filing pursuant to Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics, 403 U.S. 388 (1971).

Plaintiff's Information

Name	MOORE TERRENCE			Prisoner No.	208380
Place of Confinement	KINROSS CORRECTIONAL FACILITY				
Street	16770 WATERLOO DR.	City	KINCHELOE	State	MI.
				Zip Code	49788
Are there additional plaintiff's? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					

If yes, any additional plaintiffs to this action should be listed on a separate 8½" x 11" sheet of paper and securely attached to the back of this complaint. You must provide names, prisoner numbers and addresses for all plaintiffs.

Defendant's Information

Name	PETER J. ELLENSON (47383)			Position	248-691-9020 APPELLATE COUNSELOR
Street/P.O. Box	26862 Woodward Ave	City	ROYAL OAK	State	MI.
				Zip Code	48067
Are you suing this defendant in his/her: <input type="checkbox"/> Personal Capacity <input type="checkbox"/> Official Capacity <input checked="" type="checkbox"/> Both Capacities					
Are you suing more than one defendant? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					

If yes, any additional defendants to this action should be listed on a separate 8½" x 11" sheet of paper and securely attached to the back of this complaint. You must provide their names, positions, current addresses and the capacity (personal, official or both) in which you are suing them.

MIED (Rev. 2/07) Prisoner Civil Rights Complaint

I. PREVIOUS LAWSUITS

Have you filed any other lawsuits in state or federal court relating to your imprisonment?

☒ Yes☐ No

If "Yes," complete the following section. If "No," proceed to Part II.

Please list all prior civil actions or appeals that you have filed in federal court while you have been incarcerated.

Docket or Case Number:	08-CV-11678
Name of Court:	EASTERN DISTRICT OF MICHIGAN
Parties (Caption or Name of Case):	TERRENCE MOORE V. CINDI CURTIN PETITIONER WARDEN
Disposition:	N/A

Docket or Case Number:	09-CV-13536
Name of Court:	EASTERN DISTRICT OF MICHIGAN
Parties (Caption or Name of Case):	TERRENCE MOORE V. George HARLEY ET AL (et Plaintiff Defendant
Disposition:	

Docket or Case Number:
Name of Court:
Parties (Caption or Name of Case):
Disposition:

Any additional civil actions should be listed on a separate sheet of 8½" x11" paper and securely attached to the back of this complaint.

MIED (Rev. 2/07) Prisoner Civil Rights Complaint

III. STATEMENT OF FACTS

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include the names of other people, dates and places involved in the incident. Do not give any legal arguments or cite any cases or statutes. If you intend to allege several related claims, number and set forth each claim on a separate 8½" x 11" sheet of paper and securely attach the papers to the back of this complaint.

Plaintiff bring A claim of malpractice/Prejudice
Against MR. PETER ELLENSON for the in-
effective Assistance of Appellate Counsel
for failure to obtain (Plaintiff) Medical
Records to prove (Plaintiff) Assertions
of Abuse by the Ferndale Police Department
As so trial counsel MR. Todd A Fox Acting
in concert the failure to assert an Available
→ Defence.

IV. RELIEF

State briefly and exactly what you want the Court to do for you.

(Cause of wrongful
CONVICTION)

A JURY TRIAL ON ALL ISSUES TRIABLE BY JURY
FOR COMPENSATORY DAMAGES: AWARDED TO
PLAINTIFF, PUNITIVE DAMAGES: AWARDED TO
PLAINTIFF, \$10 Million dollars Against
EACH Defendant
MR. PETER J. ELLENSON (P47383)
MR. TODD A. FOX (P48963)

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Executed (signed) on November 23, 2009 (date).

Lawrence D. Moore
Signature of Plaintiff - [Inmate's Name]

DEFENDANT(S).

1).PETER J.ELLENSON (P47383), A Servant of the Public and Private Practice's-An employee of the State of Michigan...24901 NORTHWESTERN HIGHWAY..Suite#122 SOUTHFIELD,MICHIGAN#48075.

2).TODD A.FOX (48963), A SERVANT of the Public and Private Practice's-An employee of the State of Michigan...FOX&ASSOCIATES P.C. 5619 HIGHLAND ROAD WTERFORD,MICHIGAN#48327.

"EVERY PERSON WHO, UNDER COLOR OF ANY STATUTE, ORDINANCE, REGULATION, CUSTOM OR USAGE, OF ANY STATE OR TERRITORY, OR THE DISTRICT OF COLUMBIA, SUBJECTS, OR CAUSES TO BE SUBJECTED, ANY CITIZEN OF THE UNITED STATES OR OTHER PERSON WITHIN THE JURISDICTION THEREOF OF THE DEPRIVATION OF ANY RIGHTS, PRIVILEGES, OR IMMUNITIES SECURED BY THE CONSTITUTION AND LAWS, SHALL BE LIABLE TO THE PARTY INJURED IN AN ACTION AT LAW, SUIT IN EQUITY, OR OTHER PROPER PROCEEDING FOR REDRESS..."

The United States Supreme Court has said that a defendant's action can be considered state action (acting under the authority of the state) where there is a "Misuse of Power, possessed by virtue of the state law and made possible only because the wrongdoer is clothed with the power of authority of the state law."

ALL Defendant's mentioned here are representing figures before the Courts; A LAWYER IS A REPRESENTATIVE OF CLIENT'S, AN OFFICER OF THE LEGAL SYSTEM AND A PUBLIC CITIZEN HAVING SPECIAL RESPONSIBILITY FOR THE QUALITY OF JUSTICE.

MICHIGAN COURT RULE 9.103 standards of conduct for
ATTORNEY

THE LICENSE TO PRACTICE LAW IN MICHIGAN IS, AMONG OTHER THINGS, A CONTINUING PROCLAMATION BY THE SUPREME COURT THAT THE HOLDER IS FIT TO BE ENTRUSTED WITH PROFESSIONAL AND JUDICIAL MATTERS AND TO AID IN THE ADMINISTRATION OF JUSTICE AS AN ATTORNEY AND COUNSELOR AND AS AN OFFICER OF THE COURT.

ALL DEFENDANT'S action is Plain and clear on record of Trial and Motion's Filed And Abandoned Within Proceeding's of Trial Transcript's And Appellate Procedures on Review.

TRIAL ATTORNEY:TODD A.FOX (P48963)
CASE NO:05-202583-FC
APPELLATE ATTORNEY (P47383)
CASE NO:COA 268465

Plaintiff Now learned of His Constitutional Right's being Violated by both Defendant's Named here in this Complaint (PLAINTIFF) Now Assert As an Afforded Right to Bring A Breach of A Fiduciary Claim Where (PLAINTIFF) Held in Trust His Constitutional Right Unto both Defendant's PETER J.ELLESON/TODD A.FOX (A PERSON AS THE SAME HOLDING THE CHARACTER OF A TRUSTEE-IN CONFIDENCE INVOLVED IN IT AND THE SCRUPULOUS GOOD-FAITH AND CANDOR WHICH IT REQUIRE)..IS SIX YEARS TO BRING A CLAIM.,(PLAINTIFF)..Further States the Claim of a two year Malpractice Statute or the three year civil rights Statute wouldn't Legally bar any Action against (Trial Counsel) due to the (PLAINTIFF) NOW Realization of an Afforded Right to Proceed.

It has also been held that an eight Amendment Violation Will Not be Found unless the Responsible official(s) are Shown to Have Had a particular Culpable State of Mind: PLAINTIFF'S FIRST AND FOREMOST ASSERTIONS WAS THE ABUSE HE SUBSTAINED WHILE IN THE CUSTODY OF THE FERNDALE POLICE DEPARTMENT AND THAT HIS INJURIE'S COULD BE PROVED BY HIS EXISTING MEDICAL RECORDS: Both counsel's failure to obtain and use or imply the significant mitigating evidence that there client relied upon challenge the extracted confession alleged by there client violated with intent to undermine and neglect there duties as public official's whom abandoned there client afforded right to counsel.

STANDARD OF REVIEW:This court reviews a claim of a denial of the right to effective assistance under a de novo standard,STRICKLAND v WASHINGTON 466 US 668;104 Sct.2052;80 LE2d 674(1984);PEOPLE v PICKENS 446 Mich 298;359(1994).

REPRESENTING COUNSELOR'S (APPOINTED) OR(RETAINED) ARE NOT TO DENY THE FULL REPRESENTATIONS OF THERE DUTIES AS A OFFICER OF THE COURT'S BY VALUE OF WHO CAN AFFORD AND WHO CANNOT THERE SERVICE'

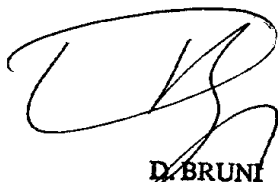
DEFENDANT (ESQ) PETER J. ELLONSON (P47383) ., individually or personally involved in violating the plaintiff's rights being that counsel condoned, encourage, or knowingly acquiesced to this conduct.

DEFENDANT (ESQ) TODD A. FOX (P48963) ., individually or personally involved in violating the plaintiff's rights being that counsel condoned, encourage, or knowingly acquiesced to this conduct.


* GENERAL DAMAGES: Pain and Suffering such as emotional distress, Pain and suffering or loss of reputation-for--example, (A PLAINTIFF) Who suffers a physical injury as a result of a violation of the civil rights statute is entitled to an award of general damages for the pain and suffering associated with those injuries and (A PLAINTIFF) Who suffers an aggravated of an existing physical condition may recover for any pain and suffering that is attributable to the Defendant(S) conduct.

RESPECTFULLY SUBMITTED,

DATE: 11/23/09



D. BRUNI
Notary Public, State of Michigan
County of Chippewa
My Commission Expires on 2-26-2013
Acting in the County of Chippewa

/s/ 
TERRENCE T. MOORE #208380
KINROSS CORRECTIONAL FAC.
16779 WARERTOWER DRIVE
KINCHELOE, MICHIGAN #49788

IN THE UNITED STATES
DISTRICT COURT FOR THE EASTERN
DISTRICT OF MICHIGAN

TERRENCE MOORE#208380
plaintiff,

HONORABLE: _____

V.

CASE NO: _____

PETER J. ELLENSON, (P47383)
TODD A. FOX, (P48963)
defendant(s)

I. JURISDICTION & VENUE

- 1). This is a civil action authorized by 42 U.S.C. Section 1983 ~~REDORESS~~ deprivation, under color of state law, of rights secured by the constitution of the UNITED STATES. The Court has Jurisdiction under U.S.C. Section 1331 and 1343 (a) (3). Plaintiff seeks Compensatory damages and Punitive relief are authorized by 28 U.S.C. Section 2283 and 2284 and Rule 65 of the federal Rules of civil Procedures.
- 2). The Eastern District of Michigan is an appropriate Venue under 28 U.S.C. Section 1391 (b) (2) BECAUSE IT IS WHERE THE EVENTS GIVING RISE TO THIS CLAIM.
- 3). Plaintiff, TERRENCE MOORE, are and was at all times mentioned herein a prisoner of the state of michigan on the custody of the michigan department of corrections. He is Currently Confined in KINROSS CORRECTIONAL FACILITY 16770 WATERTOWER DRIVE.. KINCHELOE, MICHIGAN#49788.

: THE MYRAID OF POSSIBLE CLAIMS AFFORDING
A REMEDIAL TO OBTAIN REDRESS OF A WRONG-
FUL CONVICTION SET FORTH BY THE CONSTIT-
UTION OF THE UNITED STATES OF AMERICA.

II.

3).Defendant,PETER J.ELLENSON (ESQ),were Appellate Counsel for the Plaintiff Appointed by The HONORABLE COURTS: In said Case No:#268465..He is legally Responsible For overall Assistance unto His (CLIENT) As Attorney Whom implies the best possible Defence Available unto A officer of the Court a Representative for Justice afforded unto his Client.

4).Defendant,TODD A.FOX (ESQ),were Trial Counsel for the Plaintiff Appointed by the HONORABLE COURTS:In said Case No:#05-202583-FC..He is legally Responsible For overall Assistance unto His (CLIENT) As Attorney Whom implies the best possible Defense Available unto A officer of the Court a Representative for Justice afforded unto His Client. [EACH DEFENDANT IS SUED INDIVIDULLY AND IN HIS / HER OFFICIAL CAPACITY.AT ALL TIMES MENTIONED IN THIS COMPLAINT (EACH) ACTED UNDER THE COLOR OF STATE LAW.

III.FACT(S) ON RECORD OF LOWER COURT PROCEEDING(S)

5).On JANUARY 25,26,2005 Plaintiff were Arraigned inthe 43rd.District Court by the HONORABLE Judge: JOSEPH LONGO..in the City of Ferndale..There the Plaintiff Met His Appointed Trial Counsel,TODD A.FOX (P48963) for The very first time;There and Then "Plaintiff" Reported / complained of The Abuse by The Ferndale Police Department: And The Deprivation of His MEDS..Required and Prescribe..And the Pain Plaintiff was Suffering..Counsel Motioned The Court for a Psychological Exam..Disregarding the Plaintiff Plea..

6).On JANUARY 25,26,2005 Plaintiff were escorted by the Ferndale Police Department unto Plaintiff's arraignment,on information of charged for the Alleged Murder of one MR.AMJED ABDALLAH: during this Transport of the Plaintiff (ALLEGED CULPRIT) of the Murder of MR. AMJED ABDALLAH: Plaintiff were escorted through MEDIA COVERAGE Whom While Recording (IN ATTEMPT TO QUESTION): The Plaintiff of His Bruises that was on the Plaintiff Head and why was He THE Plaintiff,Slumped over While being Forced into the Court Room DOORS..MEDIA HAS THIS FOOTAGE.

7).ON JUNE 1,2005 Plaintiff,were escorted by the Ferndale Police Department unto Plaintiff'S Preliminary Examination: In the City of Ferndale and in the state of Michigan#48909..Presiding Judge :THE HONORABLE,JOSEPH LONGO..Plaintiff Made Multiple Attempts through Both Counsel during earlier Proceedings And Forwarding of His Complaints On both Counsel the ABUSE..Trial COUNSEL Became Very Haughty to My Ideals of Defense And What the Medical Records Would Prove (SO) Plaintiff Hand Written a Complaint TO THE OAKLAND COUNTY BAR ASSOCIATIONS..SEE ATTACHED.

8).On January 19,2005, Plaintiff,TERRENCE MOORE,we're Arrested as the Alleged Suspect into the Murder Investigation of one ,MR.AMJED ABDALLAH:Th -is Investigation Had been Lead To believe that (PLAINTIFF) we're Involved In The Manious Act Committed on January 2,2005 At The establishment of MR. AMJED ABDALLAH . [PLAINTIFF ALIBI WITNESS'S PROVE OTHERWISE AFFIDAVIT IN] SUPPORT OF PLAINTIFF

9).On January 19,2005,Appoximately At 9:30 AM (PLAINTIFF) Federal P- arole Agent:MS.DAWN WIDMAN;Accompanied by Ferndale Homicide Detective KEN- NETH DENMARK;Entered the Residence of the Plaintiff (making) Verification- of the Home of Plaintiff.

10).On June 9,2005,Plaintiff,TERRENCE MOORE;We're Arraigned before - the HONORABLE:MICHAEL D.WARREN;In the City of Pontiac and In the State of Michigan; Tried and Convicted and Sentence In The 6th.Circuit Court.

11).On July 7,2006,Plaintiff,TERRENCE MOORE;We're brought before the HONORABLE Courts:Presiding Judge,MICHAEL D.WARREN;And Counsel for the Def- ense;TODD A.FOX (P48963),On Motion for Expert Independant Psychologist.

12).On August 25,2005,Plaintiff,TERRENCE MOORE;We're brought before- the Honorable Courts:Presiding Judge,MICHAEL D.WARREN;And Counsel for the Defense;TODD A.FOX (P48963),On Proceedings of PreTrial.

13).On October 31,2005,Plaintiff,TERRENCE MOORE;We're brought before the Honorable Courts:presiding Judge,MICHAEL D.WARREN;And Counsel for the Defense;TODD A.FOX (P48963),On Jury Pool / Evidentiary Hearing (VOLUME#1)

14).On November 1,2005,Plaintiff,TERRENCE MOORE;We're brought before the Honorable Courts:Presiding Judge,MICHAEL D.WARREN;And Counsel for the Defense;TODD A.FOX (P48963),On Jury Trial Volume (2).

15).On November 3,2005,Plaintiff,TERRENCE MOORE;We're brought before the Honorable Courts:Presiding Judge,MICHAEL D.WARREN;And Counsel for the Defense;TODD A.FOX (P48963),On Jury Trial Volume (3).

16).On November 4,2005,Plaintiff,TERRENCE MOORE;We're brought before the Honorable Courts:Presiding Judge,MICHAEL D.WARREN;And Counsel for the Defense;TODD A.FOX (P48963),On Jury Trial Volume (4).

17).On November 7,2005,Plaintiff,TERRENCE MOORE;We're brought before the Honorable Courts:Presiding Judge,MICHAEL D.WARREN ;And Counsel for the Defense;TODD A.FOX (P48963),On Jury Trial (5).

18).On December 13,2005,Plaintiff,TERRENCE MOORE;We're BROUGHT BEFOR -E THE Honorable Courts:Presiding Judge,MICHAEL D.WARREN;And Counsel for- the Defense;TODD A.FOX (P48963),On Sentences.

19). On December 13, 2005, Plaintiff, TERRENCE MOORE; Requested for Appointment of Counsel as Required by MCR 6.425 (F) (3) and MCR 7.204 (A) (2).

20). On February 21, 2006, (APPELLATE), PETER J. ELLENSON; (P47383) We're Appointment Counsel for the Plaintiff TERRENCE MOORE.

21). On July 26, 2007, Appellate Counsel, PETER J. ELLENSON (P47383) VACATED His Duty As A Public Official Prior to (APPELLATE COUNSEL) Forwarding (PLAIN-
TIF), Partial of the Relative Material Needed to Assert the best defense p-
ossible As A layman Could Provide.. [Appellate Counsel, Failure To Retrieve---
MEDICAL RECORDS, INVESTIGATE AND ASSIST].

22). On MAY 18, 2006, Plaintiff, TERRENCE MOORE; Notice of Filing Transcripts
We're Filed.

23). On October 25, 2006, Plaintiff Brief We're due for Appellate Review --
From the lower Court Proceedings.

ARGUMENT

A Criminal Defendant is entitled to the Assistance of Counsel at every Stage of the Proceedings Where His Substantial Rights May be Affected: COLEMAN V. ALABAMA, 399 U.S., 1, (1970).. Plaintiff Reiterate (Appellate Counsel-FAILURE TO): Investigate, As So (TRIAL COUNSEL) Acting In concert, Failure To Obtain and Present The Oakland County Jail Medical Records: That Would of Established that there Clint (PLAINTIFF), TERRENCE MOORE:: Suffered in Injuries While in The Custody of The FERNDAL POLICE DEPARTMENT; As So Both Counsel Acted In Concert.. SEE APPELLATE BRIEF (PREPARED BY: PETER J. ELLESON (P47383).. PG#21.

The Pretrial Period Constitutes A "Critical Period" of The Proceedings for Purposes of The Sixth Amendment, Which encompasses Counsel's Constitutional Duty to Investigate The Case Prior To Trial / And or Assert an Available DEFENCE Where He (TRIAL COUNSEL: TODD A. FOX P48963) (APPELLATE COUNSEL: PETER J. ELLENSON P47383) Failed To Do The Following With ...

- * COUNSEL FAILED TO PREVENT TESTIMONY TO ESTABLISH THAT THE (PLAINTIFF) WAS NOT BEING GIVEN HIS ANTI-PSYCHOTIC MEDICATIONS DURING THE 4 DAYS-- OF INTENSE INTERROGATION LEADING UP TO A CONFESSION.
- * COUNSEL FAILED TO PRESENT EVIDENCE TO ESTABLISH THAT THE PLAINTIFF--- SUFFER FROM A HOST OF MENTAL INCAPACITIES.
- * COUNSEL FAILURE TO ARGUE THE (PLAINTIFF) ALSO WE'RE SUFFERING FROM--- WITHDRAWALS FROM COCAINE AND THE DEPRIVATION OF SLEEP.

PLAINTIFF

PRAYER FOR RELIEF

24). A declaration that the acts and omissions describe herein violated Plaintiff's rights under the Constitution and the laws of the UNITED STATES.

25). Compensatory damages in the amount of 10 MILLION Dollars Against EACH Defendant's Jointly and Severally.

25). Punitive damages in the amount of 10 MILLION Dollars against each Defendant Jointly and Severally.

27). Attorney fees debted onto the Defendants.

28). Whatever the Court deem just and necessary.

Respectfully Submitted

Terrence Derrell Moore

Defence Counsel Failed to Challenge the Introduction of D.N.A.evidence that was Irrelevant,and Presented a false impression of Material facts,and also stipulated to the evidence,without investigating,violated Defendant Rights to effective Assistance of Counsel.

(TRIAL COUNSEL)
TODD A.FOX(P48963)

Defence Counsel's Deprived Plaintiff's- of His Rights to effective Assistance--
(TRIAL COUNSEL) (APPELLATE COUNSEL)
(P48963) (P47383)

By Counsel's Failure To obtain and use-- (PLAINTIFF) Medical Records Against Prosecutor's Key Witnesses to impeach the-- Witness's Crediability Whom We're Majority FERNDAL POLICE OFFICER..

RESPECTFULLY SUBMITTED,

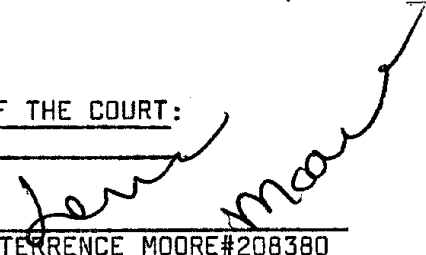
PROOF OF SERVICE

I, _____, SWEAR AND DECLARE UNDER PENALTY OF PERJURY THAT THE STATEMENTS ABOVE ARE TRUE TO THE BEST OF MY ABILITY, INFORMATION, KNOWLEDGE AND BELIEF.

3# COPIES FORWARD TO: CLERK OF THE COURT:

DATE: 11/23/09

/s/


TERRENCE MOORE#208380
16770 WATERTOWER DRIVE
KINROSS CORRECTIONAL FAC.
KINCHELOE, MICHIGAN#49788

NOTARY: 

D. BRUNI

Notary Public, State of Michigan
County of Chippewa

CC: FILE

My Commission Expires on 2-26-2013
Acting in the County of Chippewa

State of Michigan
Attorney Grievance Commission

MARQUETTE BUILDING
 243 W. CONGRESS, SUITE 256
 DETROIT, MICHIGAN 48226-3259

REQUEST FOR INVESTIGATION OF ATTORNEY:

MR. PETER J. ELLENSON (P47383) APPELLATE
 (Name of Attorney) (one attorney per request)
26862 Woodward Ave Suite #200
 (Street and Number)
ROYAL OAK, MICHIGAN #48067
 (City, State, and Zip Code)
248-691-9020
 (Area Code) (Telephone Number)

Date attorney was hired/Appointed: MARCH 6, 2006 / July 26, 2007
 Type of case (divorce, criminal, probate, etc.): CRIMINAL
 Have you ever previously submitted a Request for Investigation to our office about this attorney? NO
 If yes, When? _____

STATEMENT OF FACTS

(Please be specific. You may attach additional pages if necessary.)

Counsel's Failure to obtain / investigate / imply the significant / Mitigating evidence that his Client Relied upon / or challenge the FACTS of the Abuse by FERNDALE Police Department (METHODS) or extractions of confession's of an Alleged offense by his Client. - Counsel Abandoned and neglected his duties of effective Assistance of Counsel.
 * Record Reflect the Reliance of his pleadings *
 and Client Relied upon the safe guards of a LAYMAN; FROM A WRONGFUL Conviction of AN Innocent MAN (Complainant now learned of his constitutional Rights)

I request an Investigation by the Attorney Grievance Commission.

Date: <u>11/17/09</u> You must provide two (2) completed copies of this form and two (2) completed copies of all attachments. We cannot process unsigned complaints.	<div style="display: flex; justify-content: space-between;"> <div> <u>Terrence Terrell Moore</u> (Signature-IN INK) <u>TERRENCE TERRELL MOORE</u> (Name - type or print) <u>#208380</u> (Street and Number) <u>16770 WATER TOWER DR.</u> (City and State) (Zip Code) (Telephone Number) <u>KINCHELOE, MICHIGAN #49788</u> </div> <div style="text-align: right;"> Mr. <u>X</u> Mrs. _____ Ms. _____ </div> </div>
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State of Michigan

Attorney Grievance Commission

MARQUETTE BUILDING
243 W. CONGRESS, SUITE 256
DETROIT, MICHIGAN 48226-3259

REQUEST FOR INVESTIGATION OF ATTORNEY:

MR. Todd A. Fox (P48963) TRIAL
 (Name of Attorney) (one attorney per request)
 5619 Highland Road
 (Street and Number)
 Waterford, Michigan # 48327
 (City, State, and Zip Code)
 248-674-5100
 (Area Code) (Telephone Number)

Date attorney was hired/Appointed: January 25, 2005 / December 13 2005
 Type of case (divorce, criminal, probate, etc.): Criminal
 Have you ever previously submitted a Request for Investigation to our office about this attorney? No / Yes
 If yes, When? 4/25/05 (Oakland County Bar Ass)
 See Attached.

STATEMENT OF FACTS

(Please be specific. You may attach additional pages if necessary.)

hand (written) but have
NOTARY OF AFF.

Counsel's Failure to object to Prosecutorial Misconduct: Counsel's Failure to obtain / investigate or imply the significant / mitigating evidence that his client relied upon / or challenge the facts of the Abuse by Ferndale Police Department (Methods) or extractions of Confession's of an Alleged Offense by his client. ... Counsel Abandoned and neglected his duties of effective Assistance of Counsel.

*Record Reflect the Abuse of the defendant "but" was Abandoned in a critical Stage in Trial and left with a wrongful conviction of an innocent MAN. Complainant now learned of his Constitutional Rights

I request an Investigation by the Attorney Grievance Commission.

Date: 11/17/09

(Signature-IN INK)

(Name - type or print)

(Street and Number)

(City and State)

(Zip Code)

(Telephone Number)

Terrence Terrell Moore

#208380

16770 Water Tower Dr.

Kincheloe, Michigan #49788

Mr. X

Mrs.

Ms.

You must provide two (2) completed
 copies of this form and two (2)
 completed copies of all
 attachments. We cannot process
 unsigned complaints.

Charge: Murder #1
FELONY FIREARM
Docket: #0532362

Defendant: MR. Terrance T. Moore
Oakland County Jail
P.O. Box #436017
Pontiac Michigan
#48343

Judge: Honorable Joseph Longo
43rd District Court
Ferndale Michigan
#48220

ATTN. Oakland County Bar Ass.
1760 S. Telegraph Rd.
Suite 100
Bloomfield Hills, Michigan #48302

signature: Terrence T. Moore
4/25/05
ATTY: Todd A. Fox #P48963
Fox 3 Associates P.C.
5619 Highland Road
Waterford, Michigan
#48327

Craig John Hancock, Sr.
NOTARY PUBLIC
Oakland County, Michigan
My Commission Expires Aug 18, 2005
Acting in Oakland County

(248) 674-5100

Re: Inability to Perform
for his client Best Interest
/ Legal Disqualification

Beginning in an initial stage there was
disregard to my own suggestion of legal
steps. I believe in his steps due to the
steps of defending but in total his own
tactic of defending in these first proceedings
has shown a deliberate recommendation.

CIVIL COVER SHEET FOR PRISONER CASES

Case No. 09-14668		Judge: Arthur J. Tarnow	Magistrate Judge: Mark A. Randon
Name of 1st Listed Plaintiff/Petitioner: Terrence Moore		Name of 1st Listed Defendant/Respondent: Peter Ellenson, et al	
Inmate Number: 208380		Additional Information:	
Plaintiff/Petitioner's Attorney and Address Information:			
Correctional Facility: Kinross Correctional Facility 16770 S. Watertower Drive Kincheloe, MI 49785 CHIPPEWA COUNTY			

BASIS OF JURISDICTION

- ☐ 2 U.S. Government Defendant
☒ 3 Federal Question

ORIGIN

- ☒ 1 Original Proceeding
☐ 5 Transferred from Another District Court
☐ Other:

NATURE OF SUIT

- ☐ 530 Habeas Corpus
☐ 540 Mandamus
☒ 550 Civil Rights
☐ 555 Prison Conditions

FEE STATUS

- ☒ IFP *In Forma Pauperis*
☐ PD Paid

PURSUANT TO LOCAL RULE 83.11**1. Is this a case that has been previously dismissed?**

- ☐ Yes ☐ No

> If yes, give the following information:

Court: _____
Case No: _____
Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

- ☐ Yes ☐ No

> If yes, give the following information:

Court: _____
Case No: _____
Judge: _____